

# Exhibit A

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	Case No. 3:21-cv-00259
V.	§	[Lead Case]
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	
TEXAS STATE CONFERENCE OF THE NAACP,	§	
	§	
<i>Plaintiff,</i>	§	Case No. 1:21-cv-01006
V.	§	[Consolidated Case]
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	

**DECLARATION OF POOJA CHAUDHURI IN SUPPORT OF PLAINTIFF TEXAS  
NAACP'S MOTION FOR EXTENSION OF TIME TO FILE SECOND AMENDED  
COMPLAINT**

I, Pooja Chaudhuri, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I serve as Counsel in the Voting Rights Project of the Lawyers' Committee for Civil Rights Under Law.
2. I am one of the lead counsel representing Texas NAACP in this consolidated case *LULAC v. Abbott.*

3. My team's responsibilities have included working on the amendments to Texas NAACP's first amended complaint.

4. As part of those responsibilities, we have diligently been working to gather the necessary data vis-à-vis racially polarized voting (*i.e.*, cohesiveness and bloc voting) to respond to the Court's Order on the State's motion to dismiss Texas NAACP's first amended complaint, ECF No. 620.

5. Because of the complex analyses under *Gingles* 2 and 3, my team and I will require additional time to further flesh out our racially polarized voting analyses to address the deficiencies identified by the Court.

6. In addition, the Voting Rights Project at the Lawyers' Committee and many of our co-counsel are heavily involved in our nationwide Election Protection Program that provides voting-related information to voters across the states, ahead of the November 8, 2022 general election.

7. Over the past few weeks and continuing on through Election Day, the Election Protection Program has taken up much of counsel's time.

8. On behalf of Texas NAACP, I met and conferred with the State's attorneys on October 31, 2022, requesting an extension by one-week, until November 10, to file our second amended complaint.

9. The State's attorneys agreed to a one-week extension and additionally agreed to give Texas NAACP until November 18 to file its second amended complaint provided that, in exchange, Texas NAACP agree to give the State until December 5 to file its answer.

10. On behalf of Texas NAACP, I informed the State on November 1 via email that this proposal was acceptable.

Executed on November 1, 2022

*s/Pooja Chaudhuri*  
Pooja Chaudhuri